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January 10, 2022

VIA ECF

Honorable Pamela K. Chen
United States District Judge, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Freeman, et al. v. HSBC Holdings plc, et al.*, 18-cv-7359 (“*Freeman I*”)
Bowman, et al. v. HSBC Holdings plc, et al., 19-cv-2146 (“*Bowman*”)

Dear Judge Chen:

The Moving Defendants¹ respectfully write in response to plaintiffs’ January 7, 2022 letter regarding *Atchley v. AstraZeneca*, __ F.4th __, 2022 WL 30153 (D.C. Cir. Jan. 4, 2022) (“*Atchley*”), *Freeman II* ECF No. 103, *Bowman* ECF No. 69.

As plaintiffs acknowledge, the above-captioned cases are stayed pending decision of the appeal in *Freeman, et al. v. HSBC Holdings plc, et al.* (“*Freeman I*”), No. 19-3970, *see Freeman II* and *Bowman* Jan. 28, 2021 Order, *Freeman II* and *Bowman* Aug. 16, 2021 Order. The Moving Defendants accordingly do not believe any response to plaintiffs’ letter is necessary at this time. Because plaintiffs have nonetheless chosen to write to the Court, we enclose as Exhibit A the letter the Moving Defendants have submitted pursuant to Fed. R. App. P. 28(j) in the *Freeman I* appeal regarding *Atchley* and its material differences from the allegations in these actions. We will respond at greater length, as appropriate, after *Freeman I* is decided.

¹ The Moving Defendants are HSBC Holdings plc; HSBC Bank plc; HSBC Bank Middle East Limited; HSBC Bank USA, N.A.; Barclays Bank PLC; Standard Chartered Bank; Royal Bank of Scotland N.V. (f/k/a ABN AMRO Bank N.V.); Credit Suisse AG; and Commerzbank AG.

Hon. Pamela K. Chen, p. 2

Respectfully,

A handwritten signature in black ink, appearing to read 'J. Blackman', with a stylized, cursive-like flow.

Jonathan I. Blackman

Attachment

cc: All Counsel of Record (via ECF)